



TITLE V OPERATING PERMIT

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and §22a-174-33 of the Regulations of Connecticut State Agencies (RCSA) and pursuant to the Code of Federal Regulations (CFR), Title 40, Part 70.

Title V Permit Number	170-0012 - TV
Client/ Sequence /Town/Premises Numbers	7726 / 1 / 170 / 2
Original Issued Date	June 4, 2003
Revision Issue Date	July 10, 2003
Expiration Date	July 10, 2008

Corporation:

Sprague Paperboard, Inc.

Premises Location:

*P.O. Box 238
130 Inland Road
Sprague, CT 06383*

Name of Responsible Official and Title:

David Briere, General Manager

All the following attached pages, 2 through 45, are hereby incorporated by reference into this Title V Operating Permit.

JANE K. STAHL
Arthur J. Rocque, Jr.
Commissioner

JULY 10, 2003
Date

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LIST OF ACRONYMS

<i>Acronym</i>	<i>Description</i>
acfm	Actual cubic feet per minute
ASC	Actual Stack Concentration
BACT	Best Available Control Technology
BAM	Bureau of Air Management
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CP/OP	Construction Permit/Operating Permit
CTG	Control Technology Guideline
DEP	Department of Environmental Protection
DERC	Discrete Emission Reduction Credit
dscf	Dry standard cubic feet
dscm	Dry standard cubic meters
EU	Emission Unit
ERC	Emission Reduction Credit
EPA	Environmental Protection Agency
FLER	Full load emission rate
GEU	Grouped Emission Unit
gph	Gallons per hour
gpm	Gallons per minute
HAP	Hazardous Air Pollutant
HC	Hydrocarbon
HLV	Hazard Limiting Value
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MASC	Maximum Allowable Stack Concentration
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSR	New Source Review
PM	Particulate Matter
ppmv	Parts per million, volumetric basis
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
RMP	Risk Management Plan
SIC	Source Identification Code
SIP	State Implementation Plan
TAO	Trading Order and Agreement
TOC	Total Organic Carbon
tph	Tons per hour
tpy	Tons per year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound

Title V Operating Permit

All conditions in Sections III, IV, VI and VII of this permit are enforceable by both the Administrator and the Commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in Section III of this permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in Sections III, IV, VI and VII of this permit in accordance with the Clean Air Act (CAA), as amended.

Section I: Premises Information/Description

A. PREMISES INFORMATION

Nature of Business: Paperboard Manufacturing Facility

Primary SIC: 2631 (Paperboard Mills)

Facility Mailing Address: 130 Inland Road, P.O. Box 238, Versailles (Sprague), Connecticut 06383

Telephone Number: (860) 823-3600

Previous and/or Other Names: The facility was previously owned and operated by Federal Paperboard and International Paper.

B. PREMISES DESCRIPTION

Sprague Paperboard, Inc. (Sprague) owns and operates a recycle paperboard manufacturing facility (non-integrated facility, primary product mill) located on Inland Road, in the northwest corner of the village of Versailles, in the town of Sprague, in New London County, Connecticut. Sprague purchased the mill from International Paper – Sprague Mill in April 1999.

The operations at the mill include a full range of manufacturing and supporting activities designed to produce a variety of paper products. The facility uses post-consumer paper, cardboard, and news stock to manufacture a variety of coated, un-coated, recycled paperboard products for a wide range of end-use applications. The feedstock is re-pulped through a mechanical blending process using water as the mixing agent. The blending process is entirely mechanical and does not include kraft, soda, sulfite, or semi-chemical pulping processes. No bleaching or de-inking systems are used at the facility.

The significant operations at the mill consist of the paperboard manufacturing process, the power plant, and the building heaters. Each is discussed below.

The paperboard manufacturing process area consists of equipment and operations used to convert raw materials to paperboard. The equipment includes three dryers, an 8 MMBtu/hr coater dryer and two 6.5 MMBtu/hr coater dryers. The dryers fire either natural gas or propane. The dryers are subject to the NO_x RACT pursuant to RCSA §22a-174-22(b) because the maximum rated capacity of each unit is greater than 5 MMBtu/hr. The paper coating part of the paperboard manufacturing process area is subject to the RCSA §22a-174-20(q).

The power plant provides steam and electric power for mill operations. It includes two boilers, referred to as the PFI boiler and the FM boiler. The PFI boiler is registered with a registration number, 170-0003, while the FM boiler is permitted (permit # CP/OP 170-0001). The boilers are also subject to the requirements of the Connecticut Trading Agreement and Order number 8117 to use and create NO_x Discrete Emissions Reduction Credits (DERC). The PFI boiler also is subject to RCSA §22a-174-19a, RCSA §22a-174-22a, and RCSA §22a-174-22b.

There are four (4) fuel-fired heaters (each 8.8 MMBtu/hr) located on the roof of the main mill building used to heat and provide dehumidification for the various buildings on-site. The units fire either natural gas or propane and were installed in 1996. The units are subject to the NO_x RACT pursuant to RCSA 22a-174-22(b) because the maximum rated capacity of each unit is greater than 5 MMBtu/hr.

Section I: Premises Information/Description

B. PREMISES DESCRIPTION, continued

There are four (4) fuel-fired heaters (each 8.8 MMBtu/hr) located on the roof of the main mill building used to heat and provide dehumidification for the various buildings on-site. The units fire either natural gas or propane and were installed in 1996. The units are subject to the NO_x RACT pursuant to RCSA 22a-174-22(b) because the maximum rated capacity of each unit is greater than 5 MMBtu/hr.

There are there (3) cold cleaning degreaser units. The units are subject to RCSA §22a-174-20(l)(3).

Sprague is a major source of Hazardous Air Pollutants (HAPs) but it is not subject to 40 CFR 63 subpart S, National Emission Standards for Hazardous Air Pollutants from Pulp and Paper Industry, because the facility does not use the following processes and materials:

1. Kraft, soda, sulfite, or semi-chemical pulping process using wood; or
2. Mechanical pulping processes using wood; or
3. Any process using secondary or non-wood fibers.

The facility is a major source for NO_x and therefore, subject to NO_x RACT (RCSA §22a-174-22).

Section II: Emission Unit Description

A. EMISSIONS UNITS INFORMATION

Emission units are set forth in Table II.A.1.

TABLE II.A.1: EMISSION UNIT DESCRIPTION				
Emission Units	Grouped Emission Units	Emission Unit Description	Control and Monitoring Unit Description	* Permit, Order, Registration #, NSPS, or MACT
EMU 1		Process Dryers associated with the paperboard manufacturing process.	None	None
EMU 2		Paperboard Coating Source Group associated with the paperboard manufacturing process.	None	None
EMU 3		Babcock and Wilcox PFI Boiler with a rated capacity of 288 MMBtu/hr when fired with natural gas and 275 MMBtu/hr when fired with #6 oil.	Low-NOx Burners; NOx CEM; Bailey Opacity Monitor Model #E100-6000, Type WM5A (or equivalent)	R-0003
EMU 4		Babcock and Wilcox FM Boiler with a rated capacity of 70.1 MMBtu/hr when fired with natural gas.	Low-NOx Burners	CP/OP 170-0001
EMU 5	GEMU 1	Air Makeup Unit #1 fires natural gas or propane @ 8.8 MMBtu/hr.	None	None
EMU 6	GEMU 1	Air Makeup Unit #2 fires natural gas or propane @ 8.8 MMBtu/hr.	None	None
EMU 7	GEMU 1	Air Makeup Unit #3 fires natural gas or propane @ 8.8 MMBtu/hr.	None	None
EMU 8	GEMU 1	Air Makeup Unit #4 fires natural gas or propane @ 8.8 MMBtu/hr.	None	None
EMU 9	GEMU 2	26 gallons Cold Degreaser for the power plant area. Equipped with cover, internal drain rack.	Cover installed in accordance with RCSA §22a-174-20(l)(3)	None
EMU 10	GEMU 2	77 gallons Cold Degreaser for maintenance area. Equipped with cover, internal drain rack.	Cover installed in accordance with RCSA §22a-174-20(l)(3)	None
EMU 11	GEMU 2	26 gallons Cold Degreaser for the tow/motor area. Equipped with cover, internal drain rack.	Cover installed in accordance with RCSA §22a-174-20(l)(3)	None

(*) It is not intended to incorporate by reference these NSR Permits, Orders, or Registrations into this Title V Operating Permit.

Section II: Emission Unit Description

TABLE II.A.2: GROUPED EMISSION UNIT DESCRIPTION	
Grouped Emission Units	Description of Grouped Units
GEMU 1	Natural gas or Propane fired Air Makeup Units (EMU 6 to 9)
GEMU 2	Cold Degreasers (EMU 10 to 12).

Section II: Emission Unit Description

TABLE II.B: EMISSION UNIT IDENTIFICATION, SOS AND AOS

Identification of Operating Scenarios	Emission Units Associated with the Scenarios	Description of Scenarios
SOS	EMU 1	The standard operating scenario for EMU 1 is process drying while firing natural gas or propane.
	EMU 2	The standard operating scenario for EMU 2 is paperboard coating.
	EMU 3	The standard operating scenario for EMU 3 is to produce steam while firing Natural Gas.
	EMU 4	The standard operating scenario for EMU 4 is to produce steam while firing Natural Gas.
	GEMU 1	The standard operating scenario for GEMU 1 is to provide comfort heating while firing natural gas or propane.
	GEMU 2	The standard operating scenario for GEMU 2 is to clean parts using cold cleaning units.
AOS-1	EMU 3	The alternative operating scenario for EMU 3 is to produce steam while firing No. 6 fuel oil.
AOS-2	EMU 3	The alternative operating scenario for EMU 3 is to produce steam while simultaneously firing No. 6 fuel oil and natural gas.

Section III: Applicable Requirements

The following tables contain summaries of applicable regulations and compliance demonstration for each identified Emissions Unit and Operating Scenario, regulated by this permit.

A. EMISSION UNIT 1 (Process Dryers)

Table III.A: Emission Unit 1 (EMU 1)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. NO _x	1. The NO _x emissions from each dryer shall not exceed 180 ppmvd, corrected to 12% CO ₂ .	1. RCSA §22a-174-22(e)(2)(F)
2. TSP	2. The particulate emissions from each dryer shall not exceed 0.20 lb/MMBtu averaged over a 1-hour period.	2. RCSA §22a-174-18(d)(1)

B. EMISSION UNIT 2 (Paperboard Coating Source)

Table III.B: Emission Unit 2 (EMU 2)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. VOC	1. VOC content from each coating formulations used is limited to 2.9 lbs/gal, excluding water and exempt VOCs, delivered to the coating applicator from a paper coating line.	1. RCSA §22a-174-20(q)(2)

Section III: Applicable Requirements

C. EMISSIONS UNIT 3 (PFI Boiler)

Table III.C: Emission Unit 3 (EMU 3)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/Citations
1. NOx	<p>1.i. The NOx emissions shall not exceed 0.25 lb/MMBtu of heat input when operating on No. 6 oil (24-hour averaging time) except when NOx DERCS or NOx allowances are used by the Unit for compliance.</p> <p>1.ii. The NOx emissions shall not exceed 0.20 lb/MMBtu of heat input when operating on natural gas (24-hour averaging time) except when NOx DERCS or NOx allowances are used by the Unit for compliance.</p>	<p>1.i. RCSA §22a-174-22(e) {Table 22-2}; Connecticut Trading Agreement and Order #8117</p> <p>1.ii. RCSA §22a-174-22(e) {Table 22-2}; Connecticut Trading Agreement and Order #8117</p>
2. NOx Discrete Emission Reduction Credits (NOx DERCS)	<p>2.i. The permittee shall use approved DERC or NOx allowances trading on a monthly basis whenever the 24-hour average actual NOx emissions, based on CEM data, exceeds the NOx emission rate provided in Section III.C.1 of this permit.</p> <p>2.ii. Approved NOx DERCS or NOx allowances shall be acquired for compliance with the emission limitations given in Section III.C.1 of this permit for the periods beginning April 8, 1999 until the permittee achieves permanent compliance for the unit with the emission limitations in Section III.C.1 of this permit or until the compliance date set forth in the Trading Agreement and Order #8117, as amended, whichever occurs first.</p> <p>2.iii. The permittee shall acquire sufficient approved NOx DERCS no later than the first of each month to assure compliance for, at a minimum, that calendar month. Excess NOx DERCS from previous months can be applied to subsequent months. If the permittee does not have sufficient NOx DERCS in its possession prior to use, the NOx DERCS shortfall shall be adjusted upwards, at a minimum, by two times (2x). The NOx DERC shortfall is the difference between the approved NOx DERCS on hand and the excess actual NOx emissions calculated in Section IV.C.ii.f of this permit.</p>	<p>2.i. Connecticut Trading Agreement and Order #8117; RCSA §22a-174-22(j)</p> <p>2.ii. Connecticut Trading Agreement and Order #8117.</p> <p>2.iii. Connecticut Trading Agreement and Order #8117.</p>

Section III: Applicable Requirements

Table III.C: Emission Unit 4 (EMU 4), Continued

Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/Citations
2. NOx Discrete Emission Reduction Credits (NOx DERCS)	2.iv. For the purposes of compliance with RCSA §22a-174-22 of the Regulations, NOx DERCS/allowances shall only remain valid for five (5) calendar years from the year of the generation/allocation of such NOx DERCS/allowances. NOx DERCS/allowances older than five (5) calendar years from their creation/allocation are not valid for use for compliance with RCSA §22a-174-22 of the Regulations. Notwithstanding the above, NOx DERCS/allowances generated/allocated prior to calendar year 2000 are valid for use for compliance with RCSA §22a-174-22 of the Regulations up to and including December 31, 2004.	2.iv. Connecticut Trading Agreement and Order #8117.
3. NOx Budget Program	3. For the year 2002, the permittee shall comply with the NOx allowance use and transfer requirements set forth in RCSA § 22a-174-22a(f).	3. RCSA § 22a-174-22a(f)
4. Post-2002 NOx Budget Rule	4. For each of the years beginning 2003, the permittee shall comply with the NOx allowance use and transfer requirements set forth in RCSA § 22a-174-22b(i).	4. RCSA § 22a-174-22b(i).
5. TSP	5.i. The particulate emissions shall not exceed 0.14 lb/MMBtu of heat input when operating on No. 6 oil averaged over 1-hour period. 5.ii. The particulate emissions shall not exceed 0.20 lb/MMBtu of heat input when operating on natural gas averaged over 1-hour period.	5.i. RCSA §22a-174-18(d)(1) 5.ii. RCSA §22a-174-18(d)(1)
6. SO ₂	6. The sulfur content of the residual oil shall not exceed 1.0% by weight (dry basis).	6. RCSA §22a-174-19(a)(2)(i)
7. Opacity	7. The opacity shall be less than or equal to 20% average of 24 consecutive observations set recorded at 15 second intervals -minimum of 3 sets in a 60 minute period, and it shall be 40% no longer than 5 minutes (aggregated) in any 60-minute period.	7. RCSA §22a-174-18(a)(1)

Section III: Applicable Requirements

D. EMISSIONS UNIT 4 (FM Boiler)

Table III.D: Emission Unit 4 (EMU 4)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. NOx	<p>1.i. The NOx emissions shall not exceed 0.20 lb/MMBtu of heat input when operating on natural gas (24-hour averaging time).</p> <p>1.ii. The permittee shall comply with a NOx full load emission rate (FLER) of 0.13 lbs/MMBtu of heat input averaged over a 24-hour basis when burning natural gas. The FLER may be adjusted upon satisfactory demonstration to the Department and written approval by the Commissioner. If an established FLER is exceeded, the permittee shall purchase and retire NOx DERCS equivalent to the amount of the excess of emissions, plus a 100% premium penalty. Such NOx DERCS shall be equal to the FLER exceedance in lbs/MMBtu, multiplied by the total heat input during the period of non-compliance divided by 2000 lbs/ton. If the period of non-compliance is not known, the time period from the completion of the last/previous DEP witnessed stack test until the date of compliance with the FLER is achieved as approved by the Commissioner shall be used. The Department may require additional upward adjustment of the 100% premium penalty.</p>	<p>1.i. RCSA §22a-174-22(e) {Table 22-2}</p> <p>1.ii. Connecticut Trading Agreement and Order #8117</p>
2. NOx Discrete Emission Reduction Credits (NOx DERCS)	<p>2.i. The permittee shall generate approved NOx DERCS when burning natural gas using a full load emission rate (FLER) of 0.13 lb/MMBtu (24-hour averaging time).</p> <p>2.ii. Approved NOx DERCS are defined as those for which the Commissioner has provided written authorization for use in compliance with RCSA §22a-174-22.</p>	<p>2.i. Connecticut Trading Agreement and Order #8117; RCSA §22a-174-22(j).</p> <p>2.ii. Connecticut Trading Agreement and Order #8117.</p>

Section III: Applicable Requirements

Table III.D: Emission Unit 4 (EMU 4), Continued

Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
<p>2. NOx Discrete Emission Reduction Credits (NOx DERCS)</p>	<p>2.iii. The permittee has 12 tons of non-ozone season NOx DERCs approved for use and 5 tons of ozone season NOx DERCs making a total of 17 tons of NOx DERCs.</p> <p>2.iv. The permittee and approved sources within Connecticut shall be allowed to use the 17 tons of NOx DERCs, for purposes of compliance under RCSA §22a-174-22(d)(3). The NOx DERCs may be used for the purposes of compliance under RCSA §22a-174-22(j), to achieve a portion of the NOx emission reductions required.</p> <p>2.v. The Commissioner may provide written approval of NOx DERCs generated by the permittee in addition to the 17 tons NOx DERCs approved if the permittee generates NOx DERCs, maintains records, and provides documentation as outlined in Sections III.C and Section IV.D of this permit. Approved NOx DERCs may be held, used or transferred by the permittee to other persons. Such NOx DERCs shall remain valid until used or until the compliance date set forth in Trading Agreement and Order #8117, as amended, whichever occurs first.</p> <p>2.vi. For generating NOx DERCs, the permittee shall use the appropriate baseline emission rate given in Section III.D.1. of this permit.</p> <p>2.vii. When calculating the amount NOx DERCs generated, the permittee shall use the actual fuel usage data for the unit in MMBtu per hour or day when determining heat input.</p> <p>2.viii. After full program review, and if the Commissioner deems it appropriate, the Commissioner may allow the survival and use of the NOx DERCs generated by the permittee beyond April 30, 2007.</p> <p>2.ix. Ten (10) percent of all NOx DERCs generated by the permittee shall be retired by the permittee and permanently removed from all calculations to assure benefit to the environment and an additional ten (10) percent of these NOx DERCs to address uncertainty from using stack testing rates obtained once every 5 years in lieu of CEM results daily.</p>	<p>2.iii. Connecticut Trading Agreement and Order #8117.</p> <p>2.iv. Connecticut Trading Agreement and Order #8117.</p> <p>2.v. Connecticut Trading Agreement and Order #8117.</p> <p>2.vi. Connecticut Trading Agreement and Order #8117.</p> <p>2.vii. Connecticut Trading Agreement and Order #8117.</p> <p>2.viii. Connecticut Trading Agreement and Order #8117.</p> <p>2.ix. Connecticut Trading Agreement and Order #8117.</p>

Section III: Applicable Requirements

Table III.D: Emission Unit 4 (EMU 4), Continued		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
3. TSP	3.i. The total particulate emissions shall not exceed 5.50 lb/hr and 24.1 tpy. 3.ii. The total particulate emissions shall not exceed 0.14 lb/MMBtu of heat input when operating on natural gas averaged over 1-hour period.	3.i. CP/OP 170-0001 3.ii. RCSA §22a-174-18(d)(1)
4. SO _x	4. The SO _x (expressed as SO ₂) emissions shall not exceed 65.1 lb/hr and 285.1 tpy.	4. CP/OP 170-0001
5. HC	5. The total HC emissions shall not exceed 0.5 lb/hr and 2.2 tpy.	5. CP/OP 170-0001
6. CO	6. The total CO emissions shall not exceed 11.8 lb/hr and 51.7 tpy.	6. CP/OP 170-0001
7. Pb	7. The total Pb emissions shall not exceed 0.0019 lb/hr and 0.008 tpy.	7. CP/OP 170-0001
8. Natural Gas	8.i. The firing rate of the fuel shall not exceed 70,422 ft ³ /hr. 8.ii. Only natural gas shall be fired.	8.i. CP/OP 170-0001 8.ii. Connecticut Trading Agreement and Order #8117

E. GROUPED EMISSION UNIT 1 (Natural gas or Propane fired Air Makeup Units)

Table III.E: Grouped Emission Unit 1 (GEMU 1)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. TSP	1. The particulate emissions from each emission unit shall not exceed 0.20 lb/MMBtu averaged over 1-hour period.	1. RCSA §22a-174-18(d) (1)
2. NO _x	2. The NO _x emissions from each of the units shall not exceed 700 ppmvd	2.i. RCSA §22a-174-22(e)(2)(G)

Section III: Applicable Requirements

F. GROUPED EMISSION UNIT 2 (Cold Degreasers)

Table III.F: Grouped Emission Unit 2 (GEMU 2)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. Type of Solvent Used.	1.i. The vapor pressure of the solvent used shall not exceed 4.3 kilo pascals (33 mm of Hg or 0.6 psi) measured at 38 °C (100 °F). 1.ii. The solvent shall not be heated above 50 °C (120 °F).	1.i. RCSA §22a-174-20(1)(3)(G) 1.ii. RCSA §22a-174-20(1)(3)(G)

Section III: Applicable Requirements

G. GENERAL EMISSION REDUCTION CREDIT REQUIREMENTS

Any creation or use of DERCs for the purpose of Emissions Reduction Trading shall be consistent with the provisions of the U.S. Environmental Protection Agency's "Economic Incentive Program Rules; Proposed Rules," published February 23, 1993 (Federal Register, Volume 58, Number 34), and the U.S. Environmental Protection Agency's "Emissions Trading Policy Statement," published December 4, 1986 (Federal Register, Volume 51, Number 233). [RCSA §22a-174-22(j)(3); Connecticut Trading Agreement and Order #8117] Specifically, the reductions will be:

Real because they result in a reduction of actual emissions released into the air, net of any consequential increase in actual emissions resulting from shifting demand. The emission reductions are properly measured, recorded and reported.

Quantifiable because they are based on Stack Testing Data obtained every five years.

Surplus because they are not required by any Connecticut statute or regulation mandated by a current State Implementation Plan ("SIP"), and are not currently relied upon in any applicable attainment plan, any reasonable further progress plan or milestone demonstration.

Permanent because the advanced control system is in place and operating, and an appropriate tracking system is in place to monitor all data required to verify and quantify the creation of DERCs.

Enforceable because the DERCs are approved by the Commissioner retrospectively after the submission by the permittee of the seasonal or annual report that will document their creation.

H. 112(r) ACCIDENTAL RELEASE REQUIREMENTS

Should any of the units, as defined in 40 CFR §68.3, become subject to the accidental release prevention regulations in part 68, then the permittee shall submit a risk management plan (RMP) pursuant to 40 CFR §68.12 by the date specified in §68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 CFR §70.6(c)(5).

I. STRATOSPHERIC OZONE DEPLETING SUBSTANCES (40 CFR SUBPART 82) REQUIREMENTS

The permittee shall comply with the standards for recycling and emissions reduction of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart F.

Section IV: Compliance Demonstration

A. EMISSION UNIT 1 (EMU 1-Process Dryers)

1. Monitoring and Testing Requirements

i. Pollutants or Process Parameters: NO_x

- a. The permittee shall conduct NO_x emission tests on each affected fuel-burning unit at least once every five years commencing from the date of the most recent emissions test. [RCSA §22a-174-22(k)(1); RCSA §22a-174-5(e)(2)]

ii. Pollutants or Process Parameters: TSP

- a. If required by the Commissioner, the permittee shall measure TSP emissions using EPA Method 5. [RCSA §22a-174-5(e)(2)]

2. Record Keeping Requirements

i. Pollutants or Process Parameters: NO_x

- a. The permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance of all affected fuel-burning units. [RCSA §22a-174-22(l)(1)(D)]
- b. The permittee shall keep records copies of all documents relating to the NO_x emission submitted to the Commissioner. [RCSA §22a-174-22(l)(1)(E)]
- c. The permittee shall keep procedures for calculating NO_x emission rates. [RCSA §22a-174-22(l)(1)(G)]
- d. The permittee shall keep records of the dates, times, and places of all NO_x emission testing required, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA §22a-174-22(l)(1)(H)]
- e. The permittee shall conduct NO_x emission tests on each affected fuel-burning unit at least once every five years commencing from the date of the most recent emissions test. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. Such records and reports shall be retained at the source, unless the Commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22(l)(5)]
- f. The permittee shall maintain reports of all monitoring and test data in accordance with RCSA §22a-174-4(c).

ii. Pollutants or Process Parameters: TSP

- a. The permittee shall keep monthly and annual records of all fuel used. [RCSA §22a-174-4(c)(2)]

iii. General Record Keeping Requirements

- a. All records shall be maintained on the premises for a period of five (5) years from the date such data and information were obtained. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. [RCSA §22a-174-33(o)(2)]

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3. Reporting Requirements

i. Pollutants or Process Parameters: NO_x

- a. On or before April 15 of each year, the permittee shall submit a report on NO_x emissions from each unit, on a form provided by the Commissioner. [RCSA §22a-174-22(1)(6)]

ii. Pollutants or Process Parameters: TSP

- a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]

B. EMISSION UNIT 2 (EMU 2-Paperboard Coating Source)

1. Monitoring and Testing Requirements

i. Pollutants or Process Parameters: VOC

- a. The permittee shall maintain daily records of all coatings and diluents used. [RCSA §22a-174-20(aa)(1)]
- b. For determining the volatile content of surface coatings, the permittee shall use either Reference Method 24 or 24A as found at Appendix A of Title 40 Code of Federal Regulations Part 60. When determining the volatile fraction of a coating using American Society for Testing and Materials method D-2369, the bake time must be one (1) hour. [RCSA §22a-174-20(aa)(6)]
- c. The permittee shall achieve the emission limit by the application of low solvent content coating technology for each coating used. [RCSA §22a-174-20(bb)(1)(A)]

2. Record Keeping Requirements

i. Pollutants or Process Parameters: VOC

- a. The permittee shall maintain daily records of all coatings and diluents used. Such records shall be kept for each individual machine, operation or coating line. The records shall contain the information required below. [RCSA §22a-174-20(aa)(1)]
 1. Description of the coating including the coating name and the coating density in pounds per gallon;
 2. "volatile organic compound" content by weight;
 3. water and exempt volatile organic compound content by weight;
 4. non-volatile content by volume and by weight;
 5. amount of each coating used in gallons;
 6. total amount of diluent used for each coating in pounds and in gallons.

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EMU 2/EMU 3

- b. The permittee shall keep copies of all records and reports for a minimum of five (5) years, commencing from the date such records were created and made available upon request by the Department. [RCSA §22a-174-20(aa)(10); RCSA §22a-174-33(o)(2)]

iii. *General Record Keeping Requirements*

- a. All records shall be maintained on the premises for a period of five (5) years from the date such data and information were obtained. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. [RCSA §22a-174-33(o)(2)]

3. Reporting Requirements

i. *Pollutants or Process Parameters: VOC*

- a. The permittee shall provide the records specified above to the Commissioner within thirty (30) days after of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)]

C. EMISSION UNIT 3 (EMU 3-PFI Boiler)

1. Monitoring and Testing Requirements

i. *Pollutants or Process Parameters: NOx*

- a. The permittee shall calibrate, maintain, operate, and certify a continuous emissions monitor (CEM) for NOx. The CEM shall be installed, calibrated and operated in accordance with the performance and quality assurance specifications contained in 40 CFR 60, Subpart A, Appendix B and Appendix F. [RCSA §22a-174-22(k)(3)].
- b. The performance or quality assurance testing of the CEM shall be conducted in accordance with a testing protocol approved by the Commissioner. [RCSA §22a-174-22(k)(3)]
- c. The averaging times for the emission limitations with the use of the CEM shall be twenty-four (24) hours, measured from midnight at the beginning of any day to midnight of the end of that day and shall include all periods of operation, including startup, shutdown, and malfunction. [RCSA §22a-174-22(k)(4)]
- d. If required by the Commissioner, the permittee shall measure NOx emissions using EPA Method 7 stack test. [RCSA §22a-174-5(e)(2)]

ii. *Pollutants or Process Parameters: NOx Discrete Emission Reduction Credits (DERC) Requirements*

- a. The permittee shall acquire approved NOx DERCS monthly on an as-needed basis, as determined by actual NOx emissions in the event that the 24-hour average of actual NOx emissions exceed the NOx emission limitation stated in Section III.C.1 of this permit. Actual NOx emissions shall be based on CEM data. [Connecticut Trading Agreement and Order #8117]
- b. Before the first day of each month, the permittee shall calculate the projected (estimated) worst case NOx DERCS required for the same calendar month as follows: [Connecticut Trading Agreement and Order #8117]

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When burning natural gas or #6 oil the NO_x DERCS (tons) estimated = $\{[(\text{estimated worst case CEM 24-hour average NO}_x \text{ emission rate}) - ((0.95) \times (\text{NO}_x \text{ allowable limit in lbs/MMBtu}))] \times (\text{estimated fuel use in MMBtu})\} \div 2000 \text{ pounds.}$

- c. No later than the twentieth day of each month the permittee shall calculate the actual NO_x DERCS used in the preceding calendar month. [Connecticut Trading Agreement and Order #8117]
- d. When burning #6 oil and/or natural gas on each day, the permittee shall determine whether the 24-hour average NO_x emission rate is less than or greater than the appropriate NO_x allowable limit. [Connecticut Trading Agreement and Order #8117]
- e. When the daily NO_x emission rate (24-hour average) exceeds the NO_x allowable limit, the permittee shall calculate the amount of NO_x DERCS used, as follows: [Connecticut Trading Agreement and Order #8117]

NO_x DERCS tons actual = $\{[(\text{CEM} - \text{recorded NO}_x \text{ 24-hour average emission rate in lbs/MMBtu for \#6 oil or natural gas}) - ((0.95) \times (\text{appropriate NO}_x \text{ allowable limit in lbs/MMBtu}))] \times (\text{actual fuel use in MMBtu})\} \div 2000 \text{ pounds.}$

- g. The permittee shall use CEM data averaged on a 24-hour basis to determine the actual NO_x emission rates and calculate required NO_x DERCS when burning #6 oil or natural gas. [Connecticut Trading Agreement and Order #8117]
- h. Compliance with the DERC requirements shall be determined based on the operating fuel consumption data, CEM data, and DERC ownership and use records. [Connecticut Trading Agreement and Order #8117]
- i. Pursuant to RCSA §22a-174-22(d)(3) of the Regulations, the permittee may use NO_x allowances, pursuant to RCSA §22a-174-22(j) of the Regulations to achieve all or a portion of the reductions required by RCSA §22a-174-22 of the Regulations for the unit. Any allowances used for compliance with RCSA §22a-174-22(e) of the Regulations for the unit shall be subject to all restrictions and/or requirements applicable to NO_x DERCS contained in the Connecticut Trading Agreement and Order # 8117. [Connecticut Trading Agreement and Order #8117]
- j. Each allowance used for compliance with RCSA §22a-174-22 of the Regulations shall be equivalent to one NO_x DERCS and shall be deducted from the permittee's NO_x Budget Program compliance account upon such use. Allowances shall be considered used for RCSA §22a-174-22 of the Regulations when they are transferred from the facility's compliance account or overdraft account to a State of Connecticut NO_x allowance retirement account (Account ID CT0000000300 in NATs). [Connecticut Trading Agreement and Order #8117]

iii. *Pollutants or Process Parameters: NO_x Budget Rule and Post-2002 NO_x Budget Rule*

- a. The permittee shall comply with monitoring and testing described in RCSA § 22a-174-22a(i).
- b. The permittee shall comply with the monitoring and testing described in RCSA § 22a-174-22b(n).

iv. *Pollutants or Process Parameters: TSP*

- a. If required by the Commissioner, the permittee shall measure TSP emissions using EPA Method 5. [RCSA §22a-174-5(e)(2)]

v. *Pollutants or Process Parameters: SO₂*

- a. If required by the Commissioner, the permittee shall measure SO₂ emissions using EPA Method 6 stack test. [RCSA §22a-174-5(e)(2)]

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vi. *Pollutants or Process Parameters: Opacity*

- a. The permittee shall calibrate, maintain, operate, and certify a continuous emissions monitor (CEM) for smoke and opacity. The CEM shall be calibrated, operated and tested in accordance with the requirements specified in 40 CFR 60 Subpart A, Appendix B and Appendix F, as may be amended from time to time. [RCSA §22a-174-4(b)(1)]
- b. If required by the Commissioner, the permittee shall measure opacity using EPA Method 9. [RCSA §22a-174-5(e)(2)]

2. Record Keeping Requirements

i. *Pollutants or Process Parameters: NO_x and NO_x Discrete Emissions Reduction Credits (DERC) Requirements*

- a. The permittee shall document and record daily and monthly totals of all fuel consumption and NO_x DERCs on hand and used, daily NO_x mass emissions for each unit, and actual CEM NO_x emission rates (24-hour average) for the unit. [RCSA §22a-174-22(l)(1)(C); Connecticut Trading Agreement and Order #8117]
- b. The permittee shall maintain documentation regarding the number of NO_x DERCS in its possession, created, purchased and used (by serial number if assigned) each month, as well as documentation attesting to the fact that approved NO_x DERCS used in the ozone season were created during the ozone season. Generator certification shall be sufficient. The ozone season is May 1 to September 30 in any calendar year. All records shall be maintained in accordance with RCSA §22a-174-4 and 22a-174-22 of the Regulations and shall be provided to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner. [Connecticut Trading Agreement and Order #8117]
- c. The permittee, until April 30, 2007 (or until the compliance date set forth in Trading Agreement and Order #8117, as amended, whichever occurs first), shall acquire approved NO_x DERCS, and document and record NO_x emissions and NO_x DERCS used each month in accordance with the appropriate emission rates and limits in the table below: [Connecticut Trading Agreement and Order #8117].

NO _x Allowable Emission Rates (lb/MMBtu)		
Fuel	FLER	NO _x Allowable Limit
#6 oil Natural Gas	CEM based on a 24-hr Average	0.25
		0.20

- d. The permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance done on the unit. [RCSA §22a-174-22(l)(1)(D)]
- e. The permittee shall keep copies of all documents submitted to the Commissioner pursuant to RCSA §22a-174-22. [RCSA §22a-174-22(l)(1)(E)]
- f. The permittee shall keep all charts, electronically stored data, and printed records produced by the NO_x continuous emissions monitor. [RCSA §22a-174-22(l)(1)(F)]

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- g. The permittee shall keep procedures for calculating NOx emission rates. [RCSA §22a-174-22(l)(1)(G)]
 - h. The permittee shall keep records of the dates, times, and places of all emission testing done on this unit, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA §22a-174-22(l)(1)(H)]
 - i. The permittee shall keep records of all performance evaluations, calibration checks and adjustments on CEM; a record of maintenance procedures; and all data necessary to complete the quarterly reports required by the Commissioner. [RCSA §22a-174-22(l)(1)(I)]
 - j. The permittee shall keep any other records or reports required by an order or permit issued by the Commissioner pursuant RCSA §22a-174-22. [RCSA §22a-174-22(l)(1)(J)]
 - k. Within sixty (60) days of the completion of certification tests conducted on the CEM, the permittee shall submit a written report of the results of such testing to the Commissioner. [RCSA §22a-174-22(l)(3)]
 - l. The permittee shall retain all records and reports produced for five (5) years. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. Such records and reports shall be retained at the source, unless the Commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22(l)(5)]
 - m. The Commissioner may use data recorded by continuous emissions monitors for NOx and any other records and reports to determine compliance with the applicable requirements given in Section III.C. 1 & 2 of this permit. [RCSA §22a-174-22(l)(7)]
 - n. The permittee shall maintain reports of all monitoring and test data in accordance with RCSA §22a-174-4(c).
- ii. *Pollutants or Process Parameters: NOx Budget Rule and Post-2002 NOx Budget Rule*
- a. The permittee shall make and keep records in accordance with the following:
 - 1. The permittee shall make records of all measurements, data, reports, and other information required by this section or other state law, regulation, permit, or order. [RCSA § 22a-174-22a(j)(1)]
 - 2. The permittee shall maintain such records for a period of five (5) years. [RCSA § 22a-174-22a(j)(2)]
 - 3. The records and documents required shall be made available to the Commissioner upon the request for the Commissioner. [RCSA § 22a-174-22a(j)(3)]
 - b. The permittee shall make and keep records in accordance with the following:
 - 1. The permittee shall make records of all measurements, data, reports, and other information required by this or other state law, regulation, permit, or order. [RCSA § 22a-174-22b(o)(1)].
 - 2. The permittee shall retain such records for a period of five (5) years at the premises where such or such Budget Unit is located, unless the Commissioner approves in writing the use of another location in Connecticut. The Commissioner or the Administrator may require the owner or operation of such Budget Unit to retain such records for a longer period than five (5) years. [RCSA § 22a-174-22b(o)(2)]

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3. The records and documents required shall be made available to the Commissioner upon the request for the Commissioner. [RCSA § 22a-174-22b(o)(3)]
- iii. *Pollutants or Process Parameters: TSP*
 - a. The permittee shall keep monthly and annual records of all fuel used. [RCSA §22a-174-4(c)(2)]
- iv. *Pollutants or Process Parameters: SO₂*
 - a. The permittee shall keep the records at the premises for a period of five years. [RCSA §22a-174-33(o)(2)]
- v. *Pollutants or Process Parameters: Opacity*
 - a. The permittee shall keep all charts, electronically stored data, and printed records produced by the smoke and opacity continuous emissions monitor. [RCSA §22a-174-4(c)(1)]
- vi. *General Record Keeping Requirements*
 - a. All records shall be maintained on the premises for a period of five (5) years from the date such data and information were obtained. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. [RCSA §22a-174-33(o)(2)]
 - b. The permittee shall keep records of the dates, times, and places of all emission testing done on this unit, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA §22a-174-4(c)(1); RCSA §22a-174-22(l)(1)(H)]

3. Reporting Requirements

- i. *Pollutants or Process Parameters: NO_x and NO_x Discrete Emission Reduction Credits (DERC) Requirements*
 - a. No later than March 1 of every year, the permittee shall include with the Annual Emission Statement provided to the Commissioner, a record of each sale or other transfer, and use of any and all of the NO_x DERCS approved until all such NO_x DERCS have been used. The permittee shall also include actual NO_x emissions from each unit, and the amount of all NO_x DERCS used (including serial numbers, if assigned, and approved NO_x DERCS generated and/or purchased from other facilities), generated and/or approved for the previous calendar year. These reports shall be on a form prescribed by the Commissioner. Should the permittee choose to discontinue the generation of NO_x DERCS, the permittee will notify the Commissioner upon discontinuance. [Connecticut Trading Agreement and Order #8117; RCSA §22a-174-22(l)(6)]
 - b. The permittee shall provide all records to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]
 - c. The permittee shall notify the Commissioner in writing at least thirty (30) days prior to conducting any performance or quality assurance testing the NO_x CEM. [RCSA §22a-174-22(k)(3)]
 - d. Within sixty (60) days of the completion of certification tests conducted on the CEM, the permittee shall submit a written report of the results of such testing to the Commissioner. [RCSA §22a-174-22(l)(3)]

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- e. The permittee shall use best efforts to submit to the Commissioner all documents required by the Connecticut Trading Agreement and Order #8117 in a complete and approvable form. If the Commissioner notifies the permittee that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the permittee shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies. In approving any document or other action under the Connecticut Trading Agreement and Order #8117, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of the Connecticut Trading Agreement and Order #8117. Nothing in this paragraph shall excuse noncompliance or delay. [Connecticut Trading Agreement and Order #8117]
- ii. *Pollutants or Process Parameters: NOx Budget Rule and Post-2002 NOx Budget Rule*
 - a. The permittee shall report in accordance with the following:
 - 1. The Authorized Account Representative (AAR) or Alternate AAR of a budget source using non-CEMs-based methodologies shall submit to the Administrator emissions and operations information for the second and third calendar quarters each year. All emissions and operations information shall be submitted in accordance with 40 CFR Part 75, Subpart G, and Guidance for Implementation of Emission Monitoring Requirements for the NOx Budget Program (Ozone Transport Commission, Washington, D.C., January 28, 1997). The AAR or Alternate AAR shall submit such emissions and operations information within thirty (30) days after the end of the quarter in which the information was recorded. The AAR or Alternate AAR shall submit this information in an electronic format consistent with the requirements of with Emission Reporting Requirements and Instructions (EDR 2.0) (USEPA, Acid Rain Division July 3, 1997), or in any other format approved by the Commissioner and the Administrator. [RCSA § 22a-174-22a(k)(1)] [RCSA § 22a-174-22b currently requires the use of EDR 2.1.]
 - 2. The AAR or Alternate AAR of a budget source shall provide, in the same quarterly reports, NOx emissions in pounds per hour for every hour of the control period, and cumulative quarterly and control period NOx emission data in pounds. The AAR or Alternate AAR shall submit this information in a format consistent with Emission Reporting Requirements and Instructions (EDR 2.0) (USEPA, Acid Rain Division July 3, 1997). [RCSA § 22a-174-22a(k)(2)]
 - 3. For each control period, the AAR or Alternate AAR of a budget source shall submit an annual compliance certification to the Commissioner no later than the allowance transfer deadline following the control period. [RCSA § 22a-174-22a(m)(1)]
 - b. The permittee shall make and keep records in accordance with the following:
 - 1. The permittee shall make records of all measurements, data, reports, and other information required by this section or other state law, regulation, permit, or order. [RCSA § 22a-174-22b(o)(1)].

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2. The permittee shall retain such records for a period of five (5) years at the premises where such or such Budget Unit is located, unless the Commissioner approves in writing the use of another location in Connecticut. The Commissioner or the Administrator may require the permittee to retain such records for a longer period than five (5) years. [RCSA § 22a-174-22b(o)(2)]
3. The records and documents required shall be made available to the Commissioner upon the request for the Commissioner. [RCSA § 22a-174-22b(o)(3)]

iii. Pollutants or Process Parameters: TSP

- a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]

iv. Pollutants or Process Parameters: SO₂

- a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]

v. Pollutants or Process Parameters: Opacity

- a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]

vi. General Reporting Requirements

- a. The permittee shall submit to the Commissioner and the Administrator, written quarterly reports of excess emissions and CEM malfunctions. Such reports shall be submitted to the Commissioner and the Administrator on or before January 30, April 30, July 30, and October 30 and shall include data for the three calendar month period ending the month before the due date of the report. For each period of excess emissions, such report shall include the date and time of commencement and completion of such period, the magnitude and suspected cause of the excess emissions and all actions taken to correct the excess emissions. For each malfunction of the CEM system, such report shall include the date and time of when the malfunction commenced and ended, and all actions taken to correct the malfunction. [RCSA §22a-174-20(l)(4); RCSA §22a-174-4(c)(1)]

D. EMISSION UNIT 4 (EMU 4-FM Boiler)

1. Monitoring and Testing Requirements

i. Pollutants or Process Parameters: NO_x

- a. The permittee shall conduct NO_x emission tests at least once every five years commencing from the date of the most recent emissions test. [RCSA §22a-174-22(k)(1); Connecticut Trading Agreement and Order #8117]
- b. The emission testing method for NO_x emissions from stationary sources shall be that specified as Method 7 in Title 40 Code of Federal Regulations Part 60. [RCSA §22a-174-5(b)(7)]

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- c. The sampling and emission testing methods as specified in Section IV.D.1.i.b of this permit may be modified or adjusted with the written approval of the Commissioner as required by the specific sampling conditions or needs and in accordance with good engineering practice, judgment and experience. [RCSA §22a-174-5(d)]
- d. For the purposes of demonstrating compliance with the NO_x emissions rates specified in Section III.D.1 of this permit, any test shall be performed with the prior approval of the Commissioner as to the test method, sampling protocol and sample analysis procedures. The Commissioner shall provide forms for obtaining prior approval of testing methods, sampling protocol and sample analysis procedures. [RCSA §22a-174-5(d)]

ii. *Pollutants or Process Parameters: NO_x Discrete Emission Reduction Credits (DERC) Requirements*

- a. The permittee and approved sources within Connecticut shall be allowed to use the 17 tons of NO_x DERCS (approved by the Department by December 12, 2002), for purposes of compliance under RCSA §22a-174-22(d)(3) as shown in table below. The NO_x DERCS may be used for the purposes of compliance under RCSA §22a-174-22(j), to achieve a portion of the NO_x emission reductions required. [Connecticut Trading Agreement and Order #8117]

Approved NO _x DERCS Generated in 1999 through 2001					
Year	Ozone season	Tons	Non-ozone season	Tons	Expiration Date
1999	CT99/8117(DC)Noxoz(1-5)	5	CT99/8117(DC)Noxnoz(1-4)	4	12/31/04
2000	N/A	0	CT00/8117(DC)Noxnoz(1-6)	6	12/31/05
2001	N/A	0	CT01/8117(DC)Noxnoz(1-2)	2	12/31/06
	Total	5	Total	12	

- b. NO_x DERCS (tons) generated by the permittee shall be calculated monthly using a FLER of 0.13 lbs/MMBtu as follows: [Connecticut Trading Agreement and Order #8117]

NO_x DERCS (tons) Generated = {[(EMU 5 natural gas heat input¹ in MMBtu) x (RACT limit 0.20 lbs/MMBtu – FLER limit of 0.13 lbs/MMBtu)] ÷ 2000 lbs/ton} x (0.90) x (0.90)*

¹ Heat input shall be calculated using the actual fuel usage data in MMBtu per unit of fuel combusted.

* Ten (10) percent of all NO_x DERCS (tons) generated by the unit shall be retired by the facility and permanently removed from all calculations on a daily and monthly basis to assure a benefit to the environment.

- c. In requesting DERC approval for credits generated, the permittee shall provide documentation containing a sample spreadsheet with calculation formulas used to determine reported numbers, monthly operating reports of daily actual fuel usage including the BTU content and the number of cubic feet used in MMBtu and actual heat input based on daily actual NO_x mass emissions and NO_x emission rates (24-hour average), number of operating hours per day, and NO_x DERCS generated using the baseline emission rate(s), net of the applicable environmental and potential uncertainty discounts. [Connecticut Trading Agreement and Order #8117]

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EMU 4

- d. Requests for approval of all subsequent NOx DERCS created shall be submitted in writing to the Commissioner. Approved NOx DERCS created by the Permittee may be held or transferred to other persons. Such NOx DERCS shall remain valid until they are used or until May 1, 2007 or such later date as the Commissioner may approve in writing, whichever occurs first. [Connecticut Trading Agreement and Order #8117]
- e. Should the permittee choose to generate additional NOx DERCS, reports documenting these NOx DERCS shall be submitted to the Commissioner on an ozone season, non-ozone season (January through April and and/or October through December), or annual basis. Such reports shall be compiled on a monthly basis and shall be submitted at least on an annual basis. [Connecticut Trading Agreement and Order #8117]
- h. After full program review, and if the Commissioner deems it appropriate, the Commissioner may allow the survival and use of NOx DERCS generated by the permittee beyond April 30, 2007. [Connecticut Trading Agreement and Order #8117]
- i. Compliance with the DERC requirements shall be determined based on the operating fuel consumption data, CEM data, and DERC ownership and use records. [Connecticut Trading Agreement and Order #8117].
- j. However, if at any time after April 10, 2001 and during the period while the Connecticut Trading Agreement and Order # 8117 remains in effect, the permittee has reason to believe it may be exceeding the FLER limit, the permittee shall conduct NOx emissions testing of the unit on or before sixty (60) days after the potential exceedance of the FLER limit in accordance with the following: [Connecticut Trading Agreement and Order #8117]
 - 1. The permittee shall submit to the Commissioner for his review and written approval an Intent-To-Test ("ITT") protocol not less than thirty (30) days prior to the emissions testing required pursuant to this paragraph and Section IV.D.1.i.a of this permit. The ITT protocol shall include at least:
 - (i) The Department of Environmental Protection's Bureau of Air Management Test Form No. 1, "Intent to Test";
 - (ii) System operating parameters indicative of the highest operating rate since the April 10, 2001 stack test, including, but not limited to: steam output rate, temperature and pressure, fuel firing rate, and NOx emissions rate.
 - 2. The ITT protocol shall provide that the permittee shall perform testing as specified in Sections 22a-174-5 and 22a-174-22 of the Regulations, including operating the FM boiler at not less than ninety percent (90%) of its maximum rated capacity limit or highest operating rate since its last/previous emissions test, whichever is higher.
 - 3. The permittee shall perform all testing required in accordance with the approved ITT protocol.
 - 4. In conducting and performing the testing required by Section IV.D.1.i.a of this permit and in analyzing the results of such testing, The permittee shall adhere to methods specified in RCSA §22a-174-5 and §22a-174-22 and as approved by the United States Environmental Protection Agency ("EPA") and the Commissioner.
 - 5. The permittee shall schedule all emissions testing so as to allow the Commissioner to be present during such testing and to independently verify facility operations, air pollution control equipment parameters, and testing procedures.

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6. Within 30 days after completing any emissions testing, the permittee shall submit to the Commissioner a written report providing the results of such testing. Within 15 days of a notice from the Commissioner indicating any deficiencies in such report, the permittee shall submit a revised report.

iii. *Pollutants or Process Parameters: TSP*

- a. Annual emissions shall be verified by the permittee, by adding the current month's emissions to the previous eleven months' emissions. [RCSA §22a-174-33(j)(1)(K)(ii)]
- b. If required by the Commissioner, the permittee shall measure TSP emissions using EPA Method 5. [RCSA §22a-174-5(e)(2)]

iv. *Pollutants or Process Parameters: SO_x (expressed as SO₂)*

- a. Annual emissions shall be verified by the permittee, by adding the current month's emissions to the previous eleven months' emissions. [RCSA §22a-174-33(j)(1)(K)(ii)]
- b. If required by the Commissioner, the permittee shall measure SO₂ emissions using EPA Method 6 stack test. [RCSA §22a-174-5(e)(2)]

v. *Pollutants or Process Parameters: HCs*

- a. Annual emissions shall be verified by the permittee, by adding the current month's emissions to the previous eleven months' emissions. [RCSA §22a-174-33(j)(1)(K)(ii)]
- b. If required by the Commissioner, the permittee shall measure HC emissions using EPA Method 25 or 25A stack test. [RCSA §22a-174-5(e)(2)]

vi. *Pollutants or Process Parameters: CO*

- a. Annual emissions shall be verified by the permittee, by adding the current month's emissions to the previous eleven months' emissions. [RCSA §22a-174-33(j)(1)(K)(ii)]
- b. If required by the Commissioner, the permittee shall measure CO emissions using EPA Method 10 stack test. [RCSA §22a-174-5(e)(2)]

vii. *Pollutants or Process Parameters: Pb*

- a. Annual emissions shall be verified by the permittee, by adding the current month's emissions to the previous eleven months' emissions. [RCSA §22a-174-33(j)(1)(K)(ii)]
- b. If required by the Commissioner, the permittee shall measure Pb emissions using EPA Method 12 stack test. [RCSA §22a-174-5(e)(2)]

viii. *Pollutants or Process Parameters: Natural Gas*

- a. The permittee shall monitor monthly and annual fuel consumption. [Connecticut Trading Agreement and Order # 8117; RCSA §22a-174-22(l)(1)(C)]

Section IV: Compliance Demonstration

EMU 4

2. Record Keeping Requirements

- i. Pollutants or Process Parameters: NO_x and NO_x Discrete Emission Reduction Credits (DERC) Requirements*
 - a. The permittee shall maintain records for the unit showing daily NO_x mass emissions, and actual NO_x emission rates (24-hour average). The permittee shall also maintain records showing a monthly total of all NO_x DERCS generated net of the applicable environmental and potential uncertainty discounts. [Connecticut Trading Agreement and Order #8117]
 - b. The permittee shall maintain documentation regarding the number of NO_x DERCS in its possession, created, purchased and used (by serial number if assigned) each month, as well as documentation attesting to the fact that approved NO_x DERCS used in the ozone season were created during the ozone season. Generator certification shall be sufficient. The ozone season is May 1 to September 30 in any calendar year. All records shall be maintained in accordance with RCSA §22a-174-4 and 22a-174-22 of the Regulations and shall be provided to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner. [Connecticut Trading Agreement and Order #8117]
 - c. The permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance done on the unit. [RCSA §22a-174-22(l)(1)(D)]
 - d. The permittee shall keep copies of all documents submitted to the Commissioner pursuant to RCSA §22a-174-22. [RCSA §22a-174-22(l)(1)(E)]
 - e. The permittee shall keep procedures for calculating NO_x emission rates. [RCSA §22a-174-22(l)(1)(G)]
 - f. The permittee shall keep records of the dates, times, and places of all emission testing done on this unit, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA §22a-174-22(l)(1)(H)]
 - g. The permittee shall keep any other records or reports required by an order or permit issued by the Commissioner pursuant RCSA §22a-174-22. [RCSA §22a-174-22(l)(1)(J)]
 - h. The permittee shall retain all records and reports produced for five (5) years. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. Such records and reports shall be retained at the source, unless the Commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22(l)(5)]
 - i. The permittee shall maintain reports of all monitoring and test data in accordance with RCSA §22a-174-4(c).
- ii. Pollutants or Process Parameters: TSP*
 - a. The permittee shall maintain monthly and annual actual TSP emissions. The monthly TSP emissions shall be calculated using emission factors obtained from the latest stack test or from AP-42 and the fuel usage. Annual TSP emissions shall be calculated each calendar month by adding the current calendar month's TSP emissions to those of the previous eleven months. [RCSA §22a-174-4(c)(2)]

Section IV: Compliance Demonstration

EMU 4

iii. *Pollutants or Process Parameters: SO_x (expressed as SO₂)*

- a. The permittee shall maintain monthly and annual actual SO₂ emissions. The monthly SO₂ emissions shall be calculated using emission factors obtained from stack testing or from AP-42 and the fuel usage for the calendar year. Annual SO₂ emissions shall be calculated each calendar month by adding the current calendar month's SO₂ emissions to those of the previous eleven months. [RCSA §22a-174-4(c)(2)]

iv. *Pollutants or Process Parameters: HCs*

- a. The permittee shall maintain monthly and annual actual HC emissions. The monthly HC emissions shall be calculated using emission factors obtained from the latest stack test or from AP-42 and the fuel usage. Annual HC emissions shall be calculated each calendar month by adding the current calendar month's HC emissions to those of the previous eleven months. [RCSA §22a-174-4(c)(2)]

v. *Pollutants or Process Parameters: CO*

- a. The permittee shall maintain monthly and annual actual CO emissions. The monthly CO emissions shall be calculated using emission factors obtained from the latest stack test or AP-42 and the fuel usage. Annual CO emissions shall be calculated each calendar month by adding the current calendar month's CO emissions to those of the previous eleven months. [RCSA §22a-174-4(c)(2)]

vi. *Pollutants or Process Parameters: Pb*

- a. The permittee shall maintain monthly and annual actual Pb emissions. The monthly Pb emissions shall be calculated using emission factors obtained from the latest stack test or from AP-42 and the fuel usage. Annual Pb emissions shall be calculated each calendar month by adding the current calendar month's Pb emissions to those of the previous eleven months. [RCSA §22a-174-4(c)(2)]

vii. *Pollutants or Process Parameters: Fuel Consumption*

- a. The permittee shall keep monthly and annual fuel consumption. [Connecticut Trading Agreement and Order # 8117]

viii. *General Record Keeping Requirements*

- a. All records shall be maintained on the premises for a period of five (5) years from the date such data and information were obtained. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. [RCSA §22a-174-33(o)(2)]
- b. The permittee shall keep records of the dates, times, and places of all emission testing done on this unit, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA §22a-174-4(c)(1)]

Section IV: Compliance Demonstration

EMU 4

3. Reporting Requirements

- i. *Pollutants or Process Parameters: NO_x and NO_x Discrete Emission Reduction Credits (DERC) Requirements*
 - a. No later than March 1 of every year, the permittee shall include with the Annual Emission Statement provided to the Commissioner, a record of each sale or other transfer, and use of any and all of the NO_x DERCS approved until all such NO_x DERCS have been used. The permittee shall also include actual NO_x emissions from each unit, and the amount of all NO_x DERCS used (including serial numbers, if assigned, and approved NO_x DERCS generated and/or purchased from other facilities), generated and/or approved for the previous calendar year. These reports shall be on a form prescribed by the Commissioner. Should the permittee choose to discontinue the generation of NO_x DERCS, the permittee will notify the Commissioner upon discontinuance. [Connecticut Trading Agreement and Order #8117; RCSA §22a-174-22(l)(6)]
 - b. The permittee shall provide all records to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]
- ii. *Pollutants or Process Parameters: TSP*
 - a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]
- iii. *Pollutants or Process Parameters: SO_x (expressed as SO₂)*
 - a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]
- iv. *Pollutants or Process Parameters: HCs*
 - a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]
- v. *Pollutants or Process Parameters: CO*
 - a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]
- vi. *Pollutants or Process Parameters: Pb*
 - a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]
- vii. *Pollutants or Process Parameters: Fuel Consumption, Maximum Rated Capacity*
 - a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]

Section IV: Compliance Demonstration

EMU 4/GEMU 1

viii. General Reporting Requirements

- a. The permittee shall use best efforts to submit to the Commissioner all documents required by the Connecticut Trading Agreement and Order #8117 in a complete and approvable form. If the Commissioner notifies the permittee that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the permittee shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies. In approving any document or other action under the Connecticut Trading Agreement and Order #8117, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of the Connecticut Trading Agreement and Order #8117. Nothing in this paragraph shall excuse noncompliance or delay. [Connecticut Trading Agreement and Order #8117]

E. GROUPED EMISSION UNIT 1 (GEMU 1-Natural Gas or Propane fired Air Makeup Units)

1. Monitoring and Testing Requirements

i. Pollutants or Process Parameters: TSP

- a. If required by the Commissioner, the permittee shall measure TSP emissions using EPA Method 5. [RCSA §22a-174-5(e)(2)]

ii. Pollutants or Process Parameters: NO_x

- a. The permittee shall conduct NO_x emission tests at least once every five years commencing from the date of the most recent emissions test. [RCSA §22a-174-22(k)(1)]

2. Record Keeping Requirements

i. Pollutants or Process Parameters: TSP

- a. The permittee shall keep monthly and annual records of all fuel used. [RCSA §22a-174-4(c)(2)]

ii. Pollutants or Process Parameters: NO_x

- a. The permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance. [RCSA §22a-174-22(l)(1)(D)]
- b. The permittee shall keep records copies of all documents relating to the NO_x emission submitted to the Commissioner. [RCSA §22a-174-22(l)(1)(E)]
- c. The permittee shall keep procedures for calculating NO_x emission rates. [RCSA §22a-174-22(l)(1)(G)]
- d. The permittee shall keep records of the dates, times, and places of all NO_x emission testing required, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA §22a-174-22(l)(1)(H)]

Section IV: Compliance Demonstration

GEMU 1/GEMU 2

- e. The permittee shall retain all records and reports produced pursuant to the requirements of this section for five (5) years. Such records and reports shall be available for inspection at reasonable hours by the Commissioner or the Administrator. Such records and reports shall be retained at the source, unless the Commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22(l)(5)]
- f. The permittee shall maintain reports of all monitoring and test data in accordance with RCSA §22a-174-4(c).

3. Reporting Requirements

i. *Pollutants or Process Parameters: TSP*

- a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]

ii. *Pollutants or Process Parameters: NOx*

- a. On or before April 15 of each year, the permittee shall submit a report on NOx emissions from each unit, on a form provided by the Commissioner. [RCSA §22a-174-22(l)(6)]

F. GROUPED EMISSION UNIT 2 (GEMU 2-Cold Degreasers)

1. Design and Control Requirements

i. *Pollutants or Process Parameters: Vapor Pressure and Temperature of Solvent Used.*

- a. The permittee shall equip the cleaning device with a cover designed so that it can be easily operated with one hand. [RCSA §22a-174-20(l)(3)(A)]
- b. The permittee shall equip the cleaning device with a facility for draining cleaned parts constructed internally so that parts are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system. [RCSA §22a-174-20(l)(3)(B)]
- c. The permittee shall close the cover whenever parts are not being handled in the cleaner for two (2) minutes or more, or when the device is not in use. [RCSA §22a-174-20(l)(3)(D)]
- d. The permittee shall drain the cleaned parts for at least 15 seconds or until dripping ceases, whichever is longer. [RCSA §22a-174-20(l)(3)(E)]
- e. If used, the permittee shall supply a degreasing solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure which does not exceed ten (10) pounds per square inch as measured at the pump outlet and perform such spraying within the confines of the cold cleaning unit. [RCSA §22a-174-20(l)(3)(F)]
- f. The permittee shall minimize the drafts across the top of each cold cleaning unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters per minute, as measured between 1 and 2 meters upwind, and at the same elevation as the tank lip. [RCSA §22a-174-20(l)(3)(H)]
- g. The permittee shall not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired. [RCSA §22a-174-20(l)(3)(I)]
- h. The permittee shall provide a permanent, conspicuous label on or posted near each unit summarizing the applicable operating requirements. [RCSA §22a-174-20(l)(3)(J)]

Section IV: Compliance Demonstration

GEMU 2

2. Monitoring and Testing Requirements

i. Pollutants or Process Parameters: Type of Solvent Used.

- a. The permittee shall store waste degreasing solvent only in covered containers and not dispose of waste degreasing solvent or transfer it to another party, in a manner such that greater than 20 percent of the waste degreasing solvent (by weight) can evaporate into the atmosphere. [RCSA §22a-174-20(1)(3)(C)]
- b. The permittee shall install one of the following control devices if the solvent vapor pressure is greater than 4.3 kilo pascals (33 millimeters of mercury or 0.6 pounds per square inch) measured at 38 degrees celsius (100 degrees Fahrenheit) or if the solvent is heated above 50 degrees Celsius (120 degrees Fahrenheit): [RCSA §22a-174-20(1)(3)(G)]
 1. freeboard that gives a freeboard ratio greater than or equal to 0.7;
 2. water cover (solvent must be insoluble in and heavier than water); or
 3. other systems of equivalent control, equal to that of a "refrigerated chiller" or carbon adsorption approved by the Commissioner by permit or order.

3. Record Keeping Requirements

i. Pollutants or Process Parameters: Type of Solvent Used.

- a. The permittee shall maintain a monthly record of the amount of solvent added to each unit and keep such record for a minimum of five (5) years after such record is made. [RCSA §22a-174-20(1)(3)(K); RCSA §22a-174-33(o)(2)]

4. Reporting Requirements

i. Pollutants or Process Parameters: Type of Solvent Used.

- a. The permittee shall provide records to the Commissioner within thirty days of receipt of a written request from the Commissioner. [RCSA §22a-174-4(c)(1)]

Section V: Premises-Wide General Requirements

Table V: PREMISES-WIDE GENERAL REQUIREMENTS		
Pollutants or Process Parameters	Applicable Regulatory References/Citations	Limitations or Restrictions
Disposal and evaporation of solvents	RCSA §22a-174-20(j)	The permittee shall not, during any one day, dispose of more than one and one-half gallons (5.7 liters) of any volatile organic compound or of any material containing more than one and one-half gallons (5.7 liters) of any such volatile organic compound by any means, which will permit the evaporation of such solvent into the atmosphere.
Opacity	RCSA 22a-174-18(a)(1)(i) & (ii)	The opacity shall be less than or equal to 20% average of 24 consecutive observations set recorded at 15 second intervals - minimum of 3 sets in a 60 minute period, and it shall be 40% no longer than 5 minutes (aggregated) in any 60-minute period.
Annual Emission Statements	RCSA §22a-174-4	The permittee shall submit annual emission inventory statements requested by the Commissioner as specified in RCSA §22a-174-4(c)(1).
Emergency Episode Procedures	RCSA §22a-174-6	The permittee shall comply with the procedures for emergency episodes as specified in RCSA §22a-174-6.
Public Availability of Information	RCSA §22a-174-10	The public availability of information shall apply, as specified in RCSA §22a-174-10.
Prohibition against Concealment/ Circumvention	RCSA §22a-174-11	The permittee shall comply with the prohibition against concealment or circumvention as specified in RCSA §22a-174-11.
Particulate Matter	RCSA §22a-174-18(b)(1)	The permittee shall not cause or permit any materials to be handled, transported, or stored without taking reasonable precautions to prevent "particulate matter" from becoming airborne. The permittee shall not allow particulate emissions to be emitted to the open air in such a manner as to cause a nuisance.
Open Burning	CGS §22a-174(f)	The permittee is prohibited from conducting open burning, except as may be allowed by CGS 22a-174(f).
Emission Fees	RCSA §22a-174-26	The permittee shall pay an emission fee in accordance with RCSA §22a-174-26(d).

Section VI: State Enforceable Terms and Conditions

Only the Commissioner of the Department of Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

- A.** This permit does not relieve the permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Environmental Protection or any federal, local or other state agency. Nothing in this permit shall relieve the permittee of other obligations under applicable federal, state and local law.
- B.** Nothing in this permit shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, investigate air pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the permittee by the Commissioner.
- C.** Odors: The permittee shall not cause or permit the emission of any substance or combination of substances, which creates or contributes to an odor that constitutes a nuisance in accordance with RCSA §22a-174-23 beyond the property boundary of the premises as set forth in RCSA §22a-174-23.
- D.** Noise: The permittee shall operate in compliance with the regulations for the control of noise as set forth in RCSA §22a-69-1 through 22a-69-7.4, inclusive.
- E.** Hazardous Air Pollutants (HAPs): The permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA §22a-174-29.
- F.** Open Burning: The permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
- G.** Fuel Sulfur Content: The permittee shall not use #2 heating oil that exceeds three-tenths of one percent sulfur by weight as set forth in CGS §16a-21a.
- H.** RCSA §22a-174-19a(c): Except as authorized in writing by the Commissioner in accordance with RCSA §22a-174-19a or the Connecticut General Statutes, on and after January 1, 2003, the emission unit shall comply with one of the following: (i) the sulfur content of the liquid fuel, gaseous fuel, or a combination of each shall be equal to or less than 0.3% sulfur, by weight (dry basis); (ii) the average SO₂ emission rate shall be equal to or less than 0.33 pounds SO₂ / MMBtu for each calendar quarter; or (iii) the average emission rate shall be equal to or less than 0.3 pounds SO₂ / MMBtu calculated for each calendar quarter, if the permittee averages the emissions from two or more emission units at the premises.

Section VII: Permit Shield

NO PERMIT SHIELD GRANTED

In accordance with RCSA §22a-174-33(k), a permittee complying with the conditions of this permit shall be deemed in compliance with any applicable requirements identified in Table VI below as of the date of issuance. Also, in accordance with RCSA §22a-174-33(k), a permittee complying with the conditions of this permit shall be deemed exempt from any non-applicable requirements identified below as of the date of issuance.

This permit shall not alter or affect the following:

- A. the provisions of section 303 of the Clean Air Act, including the authority of the Administrator under the Act;
- B. the liability of an owner or operator of a Title V source for any violation of applicable requirements prior to or at the effective date of a Title V permit;
- C. the applicable requirements of the acid rain program under 40 CFR Part 72; and
- D. the ability of the Administrator or Commissioner to obtain information from the owner or operator of a Title V source.

TABLE VIII PERMIT SHIELD				
Regulated Pollutants	Emissions Units	Applicable Requirement or Non-Applicable Requirement Descriptions	Applicable Regulatory References	*Applicability
N/R				

*For Applicability, use AR to indicate Applicable Requirement and NR for Non- Applicable Requirement

Section VIII: Title V Requirements

The Administrator of the United States Environmental Protection Agency and the Commissioner of Environmental Protection have the authority to enforce the terms and conditions contained in these sections.

A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

The date of submission to the Commissioner of any document required by this permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

Any document required to be submitted to the Commissioner under this permit shall, unless otherwise specified in writing by the Commissioner, be directed to: Office of the Assistant Director; Compliance & Field Operations Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the U. S. Environmental Protection Agency shall be in a computer-readable format and addressed to: Director, Air Compliance Program; Attn: Air Compliance Clerk; Office of Environmental Stewardship; US EPA, Region 1; One Congress Street; Suite 1100 (SEA); Boston, MA 02114-2023.

B. CERTIFICATIONS [RCSA § 22a-174-33(b)]

In accordance with RCSA §22a-174-33(b), any report or other document required by this Title V permit and any other information submitted to the Commissioner or Administrator shall be signed by an individual described in RCSA §22a-174-2a(a), or by a duly authorized representative of such individual. Any individual signing any document pursuant to RCSA §22a-174-33(b) shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in RCSA §22a-174-2a(a)(5):

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under §22a-175 of the Connecticut General Statutes, under §53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute.”

C. SIGNATORY RESPONSIBILITY [RCSA § 22a-174-2a(a)]

If an authorization pursuant to §22a-174-2a(a) of the RCSA is no longer effective because a different individual or position has assumed the applicable responsibility, a new authorization satisfying the requirements of §22a-174-2a(a)(2) of the RCSA shall be submitted to the Commissioner prior to or together with the submission of any applications, reports, forms, compliance certifications, documents or other information which is signed by an individual or a duly authorized representative of such individual pursuant to §22a-174-2a(a)(2) of the RCSA.

Section VIII: Title V Requirements

D. ADDITIONAL INFORMATION [RCSA § 22a-174-33(j)(1)(X)]

The permittee shall submit additional information in writing, at the Commissioner's request, within thirty (30) days of receipt of notice from the Commissioner or by such other date specified by the Commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending the permit or to determine compliance with the permit.

In addition, within fifteen days of the date the permittee becomes aware of a change in any information submitted to the Commissioner under this permit or of any change in any information contained in the application, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the changed, corrected, or omitted information to the Commissioner.

E. MONITORING REPORTS [RCSA § 22a-174-33(o)(1)]

A permittee, required to perform monitoring pursuant this permit, shall submit to the Commissioner, on forms prescribed by the Commissioner, written monitoring reports on January 30 and July 30 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this permit, which has occurred since the date of the last monitoring report; and
3. Each deviation caused by a failure of the monitoring system to provide reliable data.

F. PREMISES RECORDS [RCSA § 22a-174-33(o)(2)]

Unless otherwise required by this permit, the permittee shall make and keep records of all required monitoring data and supporting information for at least five (5) years from the date such data and information were obtained. The permittee shall make such records available for inspection at the site of the subject source, and shall submit such records to the Commissioner upon request. The following information, in addition to required monitoring data, shall be recorded for each permitted source:

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;
6. The analytical techniques or methods used for such analyses;
7. The results of such analyses;

Section VIII: Title V Requirements

8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

G. PROGRESS REPORTS [RCSA § 22a-174-33(q)(1)]

The permittee shall, on January 30 and July 30 of each year, or on a more frequent schedule if specified in this permit, submit to the Commissioner a progress report on forms prescribed by the Commissioner, and certified in accordance with §22a-174-2a(a)(5) of the RCSA. Such report shall describe the permittee's progress in achieving compliance under the compliance plan schedule contained in this permit. Such progress report shall:

1. Identify those obligations under the compliance plan schedule in the permit which the permittee has met, and the dates on which they were met; and
2. Identify those obligations under the compliance plan schedule in this permit which the permittee has not timely met, explain why they were not timely met, describe all measures taken or to be taken to meet them and identify the date by which the permittee expects to meet them.

Any progress report prepared and submitted pursuant to §22a-174-33(q)(1) of the RCSA shall be simultaneously submitted by the permittee to the Administrator.

H. COMPLIANCE CERTIFICATIONS [RCSA § 22a-174-33(q)(2)]

The permittee shall, on January 30 of each year, or on a more frequent schedule if specified in this permit, submit to the Commissioner, a written compliance certification certified in accordance with §22a-174-2a(a)(5) of the RCSA and which includes the information identified in Title 40 CFR 70.6(c)(5)(iii)(A) to (C), inclusive.

Any compliance certification prepared and submitted pursuant to §22a-174-33(q)(2) of the RCSA shall be simultaneously submitted by the permittee to the Administrator.

I. PERMIT DEVIATION NOTIFICATIONS [RCSA § 22a-174-33(p)]

Notwithstanding Subsection D of Section VIII of this permit, the permittee shall notify the Commissioner in writing, on forms prescribed by the Commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than twenty-four (24) hours after such deviation commenced; and
2. For any other regulated air pollutant, no later than ten (10) days after such deviation commenced.

J. PERMIT RENEWAL [RCSA § 22a-174-33(j)(1)(B)]

All of the terms and conditions of this permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with Sections 22a-174-33(g), -33(h), and -33(i) of the RCSA.

Section VIII: Title V Requirements

K. OPERATE IN COMPLIANCE [RCSA § 22a-174-33(j)(1)(C)]

The permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

L. COMPLIANCE WITH PERMIT [RCSA § 22a-174-33(j)(1)(G)]

This permit shall not be deemed to:

1. preclude the creation or use of emission reduction credits or the trading of such credits in accordance with Sections 22a-174-33(j)(1)(I) and 22a-174-33(j)(1)(P) of the RCSA, provided that the Commissioner's prior written approval of the creation, use, or trading is obtained;
2. authorize emissions of an air pollutant so as to exceed levels prohibited under 40 CFR Part 72;
3. authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or
4. impose limits on emissions from items or activities specified in Sections 22a-174-33(g)(3)(A) and (B) of the RCSA unless imposition of such limits is required by an applicable requirement.

M. INSPECTION TO DETERMINE COMPLIANCE [RCSA § 22a-174-33(j)(1)(M)]

The Commissioner may, for the purpose of determining compliance with the permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under the permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

N. PERMIT AVAILABILITY

The permittee shall have available at the facility at all times a copy of this Title V Operating Permit.

O. SEVERABILITY CLAUSE [RCSA § 22a-174-33(j)(1)(R)]

The provisions of this permit are severable. If any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the remainder of this permit and the application of such provision to other circumstances shall not be affected.

P. NEED TO HALT OR REDUCE ACTIVITY [RCSA § 22a-174-33(j)(1)(T)]

It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Section VIII: Title V Requirements

Q. PERMIT REQUIREMENTS [RCSA § 22a-174-33(j)(1)(V)]

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the permittee's obligation to comply with this permit.

R. PROPERTY RIGHTS [RCSA § 22a-174-33(j)(1)(W)]

This permit does not convey any property rights or any exclusive privileges. This permit is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby, including §4-181a(b) of the Connecticut General Statutes and §22a-3a-5(b) of the RCSA. This permit shall neither create nor affect any rights of persons who are not parties to this permit.

S. ALTERNATIVE OPERATING SCENARIO RECORDS [RCSA § 22a-174-33(o)(3)]

The permittee shall, contemporaneously with making a change authorized by this permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES [RCSA § 22a-174-33(r)(2)]

The permittee may engage in any action allowed by the Administrator in accordance with 40 CFR 70.4(b)(12)(i) to (iii)(B) inclusive, and 40 CFR 70.4(b)(14)(i) to (iv), inclusive without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor permit modification or revision provided such action does not:

1. constitute a modification under 40 CFR 60, 61 or 63,
2. exceed emissions allowable under the subject permit,
3. constitute an action which would subject the permittee to any standard or other requirement pursuant to 40 CFR 72 to 78, inclusive, or
4. constitute a non-minor permit modification pursuant to §22a-174-2a(d)(4) of the RCSA.

At least seven (7) days before initiating an action specified in §22a-174-33(r)(2)(A) of the RCSA, the permittee shall notify the Administrator and the Commissioner in writing of such intended action.

U. INFORMATION FOR NOTIFICATION [RCSA § 22a-174-33(r)(2)(A)]

Written notification required under §22a-174-33(r)(2)(A) of the RCSA shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The permittee shall thereafter maintain a copy of such notice with the Title V permit. The Commissioner and the permittee shall each attach a copy of such notice to their copy of the permit.

V. TRANSFERS [RCSA § 22a-174-2a(g)]

Section VIII: Title V Requirements

No person other than the permittee shall act or refrain from acting under the authority of this permit unless this permit has been transferred to another person in accordance with §22a-174-2a(g) of the RCSA.

The proposed transferor and transferee of a permit shall submit to the Commissioner a request for a permit transfer on a form provided by the Commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The Commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS §22a-6m.

W. REVOCATION [RCSA § 22a-174-2a(h)]

The Commissioner may revoke this permit on his own initiative or on the request of the permittee or any other person, in accordance with §4-182c of the Connecticut General Statutes, §22a-3a-5(d) of the RCSA, and any other applicable law. Any such request shall be in writing and contain facts and reasons supporting the request. The permittee requesting revocation of this permit shall state the requested date of revocation and provide the Commissioner with satisfactory evidence that the emissions authorized by this permit have been permanently eliminated.

Pursuant to the Clean Air Act, the Administrator has the power to revoke this permit. Pursuant to the Clean Air Act, the Administrator also has the power to reissue this permit if the Administrator has determined that the Commissioner failed to act in a timely manner on a permit renewal application.

This permit may be modified, revoked, reopened, reissued, or suspended by the Commissioner, or the Administrator in accordance with §22a-174-33(r) of the RCSA, Connecticut General Statutes §22a-174c, or §22a-3a-5(d) of the RCSA.

X. REOPENING FOR CAUSE [RCSA § 22a-174-33(s)]

This permit may be reopened by the Commissioner, or the Administrator in accordance with §22a-174-33(s) of the RCSA.

Y. CREDIBLE EVIDENCE

Notwithstanding any other provision of this permit, for the purpose of determining compliance or establishing whether a permittee has violated or is in violation of any permit condition, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information.